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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, ) No. CR 08-0884 VRW  
Plaintiff, )  
v. ) STIPULATION REQUESTING  
JOSEPH WILLIS, JR., ) PROTECTIVE ORDER, AND  
Defendant. ) ~~[PROPOSED]~~ ORDER

The parties respectfully stipulate as follows:

1. The United States expects to call as a witness at trial Deneal Bobo, the undercover FBI source who conducted the crack cocaine purchase charged against defendant in the indictment.

2. Mr. Bobo has a criminal record. The United States would like to provide Mr. Bobo's criminal "rap sheet" to defendant in advance of trial. The parties agree that it is appropriate to restrict disclosure of the rap sheet solely to defendant, defendant's counsel, and any other member of defendant's trial team, including the investigative firm or any expert witness assisting in the preparation of the defense, in the above captioned matter and solely for

use in preparing for and conducting the trial of the above-captioned matter. The parties agree that the persons described in the previous sentence should be barred from distributing Mr. Bobo's rap sheet to any other person or entity. Such persons are also barred from using it for any purpose other than trial in the above-captioned matter.

3. Mr. Bobo has a pending criminal case in this district, United States v. Deneal  
Bobo, No. CR 08-0618 WHA. The United States represents that Mr. Bobo has entered into a  
plea agreement with the United States in that pending criminal case and would like to provide a  
copy of that plea agreement to defendant in advance of trial in the instant case. That plea  
agreement is currently under seal. The United States will seek an order from Judge Alsup  
authorizing disclosure of Mr. Bobo's plea agreement to defendant in the instant matter. The  
parties believe that it is appropriate to restrict the disclosure of Mr. Bobo's plea agreement under  
the same terms as described above concerning the rap sheet – that is, that disclosure of the plea  
agreement shall be limited to defendant, defendant's counsel, and any other members of  
defendant's trial team including any investigators and/or expert witnesses, and that these  
individuals may use this plea agreement solely for purposes of preparing for and conducting the  
trial in the above captioned matter.

4. The parties respectfully ask the Court to enter a protective order consistent with this stipulation. A proposed order is set out below.

## IT IS SO STIPULATED.

DATED: May 26, 2009

/s/  
ANN C. MOORMAN  
Attorney for Defendant

DATED: May 26, 2009

/s/  
ANDREW P. CAPUTO  
Assistant United States Attorney

1                   **[PROPOSED] ORDER**

2                 Upon consideration of the parties' stipulated request for a protective order, the Court  
 3 hereby enters the following order:

4                 The United States shall disclose forthwith to defendant's counsel the criminal "rap sheet"  
 5 for Deneal Bobo. Disclosure of the rap sheet shall be restricted to defendant, defendant's  
 6 counsel, and any other members of defendant's trial team in the above-captioned matter. These  
 7 specified individuals may use the rap sheet solely for purposes of trial in the above-captioned  
 8 matter and are barred from disclosing it to any other person or using it for any other purpose.

9                 If and when authorized to do so by Judge Alsup, the United States shall disclose to  
 10 defendant's counsel in the instant case the plea agreement entered into by Mr. Bobo in United  
 11 States v. Deneal Bobo, No CR 08-0618 WHA. Disclosure of the plea agreement shall be  
 12 restricted to defendant, defendant's counsel, and any other members of defendant's trial team in  
 13 the above-captioned matter. These specified individuals may use the plea agreement solely for  
 14 purposes of trial in the above-captioned matter and are barred from disclosing it to any other  
 15 person or using it for any other purpose.

16                 IT IS SO ORDERED.

17  
 18 DATED: May 27, 2009

